

**Claim Objection Hearing Date: February 14, 2007 (10:00 a.m.)**  
**Supplemental Response Deadline: January 3, 2007 (4:00 p.m.)**

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: :  
: :  
DELPHI CORPORATION, et al., : Chapter 11  
: Case No. 05-44481-RDD  
Debtors. : Jointly Administered  
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**SUPPLEMENTAL RESPONSE BY NISSAN TECHNICAL CENTER  
NORTH AMERICA, INC. TO DEBTORS' THIRD OMNIBUS CLAIMS OBJECTION**

Nissan Technical Center North America, Inc. (“Nissan”), by and through counsel, hereby files this supplemental response to the Third Omnibus Claims Objection (the “Objection”) of the above-captioned debtors (the “Debtors”) and their Statement of Disputed Issues (the “Statement”) regarding Nissan’s claim number 13409 (the “Claim”). In support of its supplemental response, Nissan respectfully states as follows:

1. Pursuant to the Claims Objection Procedures Order (as defined in the Statement), Nissan and the Debtors are required to meet and confer in order to explore settlement opportunities prior to December 26, 2007. By agreement, Nissan and the Debtors have postponed the required conference (the “Conference”) in light of the difficulty of scheduling same during the automotive industry’s “shut-down” period. The Debtors have not, however,

agreed to extend any other deadlines under the Claims Objection Procedures Order; thus, Nissan files this supplemental response to apprise the Court of the status of the Objection and to reserve its rights with respect to same. For the reasons set forth more fully hererin, it appears that the Conference may not be necessary.

2. In the Statement, the Debtors admit that \$32,734.44 (the "Claim Amount") remains outstanding on account of unpaid July and August 2005 invoices under the Test Track Agreement (as defined in the Statement). Nissan believes that the Claim Amount is indeed outstanding and that such Claim Amount should be allowed as a general unsecured claim.

3. In the Statement, the Debtors assert that the Administrative Claim, arising from certain unpaid post-petition rental payments and other charges, is procedurally improper. While Nissan concedes that such Administrative Claim may require a separate and distinct request apart from the Claim, Nissan reserves any and all rights with respect to the Administrative Claim. Moreover, Nissan agrees with the Debtors, as stated in their Statement, that the objection is "without prejudice to Nissan's ability to properly assert an administrative claim and the Debtors' rights to dispute the same." Nissan intends to engage the Debtors in discussions to reconcile and resolve the Administrative Claim consensually.

4. Nissan intends to engage the Debtors in discussions to document a resolution resolving the sum and substance of the Claim and anticipates that an agreed stipulation and order will be submitted to the Court, which agreement should avert the need for the hearing currently scheduled for February 14, 2007 at 10:00 a.m. (the "Claim Objection Hearing").

5. Nissan further reserves any and all rights to amend or supplement this response or to file a motion seeking adjournment of the Claim Objection Hearing (as well as relief from any deadlines under the Claims Objection Procedures Order), should the consensual resolution outlined above fail to materialize for any reason whatsoever.

Dated: December 22, 2006, 2006  
Nashville, Tennessee

Respectfully submitted:

**Waller Lansden Dortch & Davis, LLP**

/s/ Robert J. Welhoelter, Esq.

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**Attorneys for  
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***CERTIFICATE OF SERVICE***

In accordance with Local Bankruptcy Rule 9078-1 and the Claims Objection Procedures Order, the undersigned certifies that on December 22, 2006 a true and correct copy of the following pleading was served via ECF, and upon the parties listed below by hand delivery where indicated, electronically where indicated, or otherwise by U.S. Mail, postage prepaid:

**RESPONSE BY NISSAN TECHNICAL CENTER NORTH AMERICA, INC.  
TO DEBTORS' THIRD OMNIBUS CLAIMS OBJECTION**

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Dated: December 22, 2006  
Nashville, Tennessee

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